

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In the Bankruptcy Matter of:

Timothy J. Weatherby  
Soraya C. Weatherby

Debtors

Bankruptcy No. 19-22138  
Judge Donald R. Cassling  
Chapter: 13

**OBJECTION TO CONFIRMATION**

NOW COMES Lakeview Loan Servicing, LLC (hereinafter "Movant"), through its attorney, Josephine J. Miceli of Johnson, Blumberg & Associates, LLC, and states as follows:

1. The above-captioned Chapter 13 case was filed on August 7, 2019.
2. The Movant, a party in interest, holds a Mortgage dated December 31, 2016 on the property located at 8844 S 55th Ct., Oak Lawn, Illinois 60453, in the original amount of \$222,176.00.
3. The Movant is in the process of preparing the proof of claim and anticipates filing the claim prior to the bar date. The Movant's estimated arrearage claim is \$7,144.07
4. The Debtors plan provides that the Chapter 13 Trustee is to pay the Movant \$3,168.00 for its arrearage claim. Said plan does not fully pay Movant's actual claim and as such, the plan is unfeasible.
5. Based on the anticipated claims, by not paying the full amount of Movant's claim, the proposed plan modifies the rights of the Movant and such modification is inconsistent with the provisions of 11 U.S.C. 1322(b)(2) and as such, the plan does not comply with the Bankruptcy Code.

WHEREFORE, Lakeview Loan Servicing, LLC prays that confirmation of the Debtors' plan be denied and for such other relief as the Court deems just.

/s/ Josephine J. Miceli

Josephine J. Miceli, ARDC #6243494  
Attorney for Lakeview Loan Servicing, LLC

Josephine J. Miceli  
Johnson, Blumberg, & Associates, LLC  
230 W. Monroe Street, Suite 1125  
Chicago, Illinois 60606  
Ph. 312-541-9710  
Fax 312-541-9711

**NOTICE:**

THIS LAW FIRM IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION  
OBTAINED WILL BE USED FOR THAT PURPOSE